

**Before the  
Federal Communications Commission  
Washington, D. C. 20554**

In the Matter of:

Wireless Broadband Access Task Force  
Seeks Public Comment on Issues  
Related to Commission's  
Broadband Policies

GN Docket No. 04-163

**Comments of Nortel Networks**

Nortel Networks (Nortel) is pleased to have the opportunity to file these comments in response to certain questions posed by the Wireless Broadband Access Task Force. Nortel commends the Commission for creating the task force, and looks forward to working closely with the task force as it conducts its very important outreach efforts, and delivers its report to the Commission by October of 2004.

Nortel's comments follow the relevant questions as excerpted from the Public Notice (DA 04-1266):

**8. With the continued development of new technologies and network configurations, including mesh networks and integrated wireless broadband networks and devices that use both licensed and unlicensed spectrum, are there any rules that require review for updating or increased flexibility?**

With the development of new technologies and applications, the distinction between fixed, nomadic, and mobile broadband services will blur over time. Users will want to access the same applications and features (and as a result use similar bandwidths) whether they are at home, at work or on the move. Regulations for wireless broadband services should consider this eventual evolution and avoid restrictions that may stifle future innovation. For example, regulations that favor fixed wireless applications, but

prevent the inevitable evolution to nomadic and mobile wireless applications and services should be avoided. In addition, the use of current mobile technologies such as EV-DO or UMTS for fixed and nomadic broadband applications in rural areas should be encouraged to provide service where wired broadband services are not available and to stimulate competition.

**9. We also seek comment on the types of applications associated with wireless broadband deployment.**

**a. What types of applications are or will be offered over wireless broadband networks? Are they similar to the applications of the wired Internet (email and web surfing), or are other, more personalized, niche applications being developed? Do the applications differ between licensed and unlicensed networks? What is the relationship between network operators and content providers?**

Over time, all applications available on the wired Internet will be available as fixed, nomadic and mobile over wireless licensed or unlicensed broadband networks.

Respectfully submitted,

/s/

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